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**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF UTAH**

IN THE MATTER OF THE PETITION OF)
QWEST CORPORATION FOR ARBITRATION OF)
AN INTERCONNECTION AGREEMENT WITH)
UNION TELEPHONE COMPANY d/b/a UNION) Docket No. 04-049-145
CELLULAR UNDER SECTION 252 OF THE)
FEDERAL TELECOMMUNICATIONS ACT)

The following is a response by the Division of Public Utilities (DPU) to the Motion by Union Telephone Company to accept the testimony of Henry Jacobson and for a delay in filing responsive testimony by the Division and Qwest:

1. The Division was scheduled to file its responsive testimony on March 16, 2007. Responsive testimony to the DPU was due shortly after that with a hearing scheduled for late April. Independent of the new testimony filed by Union, the DPU had requested of the parties' additional time to file its testimony. No one seemed to have an objection to that delay. The need for additional time for the DPU to file its response to the cost study exists regardless of what happens to Mr. Jacobsen's testimony. The DPU does have significant issues with the cost study done by Union, some of which could be answered by a technical conference. Therefore, regardless of how this Motion is handled, a new schedule needs to be developed to allow additional time for DPU to respond to Qwest and Union's testimony.

2. The DPU has no objection to changing the schedule to allow the additional testimony to be presented as long as the DPU and Qwest are given time to do any needed discovery and file testimony. At least for the DPU, it is our current intention to send out any data requests we have on the new testimony sometime this week.

3. With respect to filing testimony in response to Mr. Jacobsen's testimony, the DPU would prefer to file after it sees Qwest's responsive testimony.

4. It is unlikely that with the above issues being addressed that the current hearing date can be maintained. As was stated earlier regardless of what happens with Mr. Jacobsen's testimony a new schedule needs to be developed to allow the DPU to file its testimony and allow time for responses. It was also the DPU preference that if possible a technical conference be held to discuss some of the cost study issues. Once Qwest responds to the Motion and any issues that need to be resolved by the Commission are heard either the parties can reach an agreement on a new schedule or a scheduling conference should be set up.

5. Submitted this of March 2007

Michael Ginsberg
Assistant Attorney General

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served via electronic mail and/or first class mail (postage prepaid) on this ____ day of March, 2007, addressed as follows:

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